

**From:** (b) (6)  
**To:** (b) (6)  
**Subject:** RE: Air regulatory requirements for DHS support (UNCLASSIFIED)  
**Date:** Tuesday, July 3, 2018 4:23:00 PM

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(b) (6)

Can you please spell the acronyms?

Respectfully,

(b) (6)  
Supervisory Environmental Engineer  
Division Chief, Environmental Division

Directorate of Public Works  
Building 624, Room 116A  
1733 Pleasonton Rd.  
USAG Fort Bliss, TX 79916

(b) (6)

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-----Original Message-----

**From:** (b) (6)  
**Sent:** Tuesday, July 03, 2018 11:06 AM  
**To:** (b) (6)  
**Subject:** FW: Air regulatory requirements for DHS support (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Hi (b) (6) go with this inf...

As per our conversation yesterday:

1) Using generators ( INTERNAL COMBUSTION RECIPROCATING ENGINES)in the camp will not require any registration or trigger any regulatory air requirements since they will be considered a mobile source as per 40 CFR Part 1068 . EPA would consider a portable engine stationary and subject to the NSPS-NESHAP if it: 1.) Remains at the same location for more than 12 consecutive months.

2) If the plan is to have them longer than a year than authorization as per 40 CFR part 60 subpart iii (4207) will be needed.

The possible authorizations would be

- a) PBR 106.512. This will take approx. 30 days
- b) Standard permit PI-S (Electric Generating Unit Standard Permit ) or
- b) PI-1 case-by-case permit. This will take a year or more \*\*however, without knowing the size and number of units, it is not possible to know which authorization would work.

\*\*\*The tricky part is, if you go under the assumption that they will be present for less than a year, but you determine sometime down the road during that year period that they will be needed longer than a year, then at that point, you would have to stop operating and get the correct authorization, which could take 30 days or so at the short end if the PBR would work, and a year or more if a PI-1 is needed.

Thank you

(b) (6)

Air & Waste Water Program Manager

Directorate of Public Works

Environmental Division/Compliance Branch Building 622, Office 104 Bldg 622, Taylor Road USAG Fort Bliss, TX 79916

(b) (6)

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-----Original Message-----

From: (b) (6)

Sent: Tuesday, July 3, 2018 10:56 AM

To: (b) (6)

Cc: (b) (6)  
Subject: RE: Air regulatory requirements for DHS support (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

(b) (6)

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(b) (6)

Air & Waste Water Program Manager

Directorate of Public Works

Environmental Division/Compliance Branch Building 622, Office 104 Bldg 622, Taylor Road USAG Fort Bliss, TX 79916

(b) (6)

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